

UNITED STATES DISTRICT COURT

for the

Western District of Texas**FILED**

May 29, 2025

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASUnited States of America
v.BY: ac
DEPUTY

Case No. SA-25-MJ-849

Damian Soto*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 28, 2025 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 933 (2) & (3)

Attempt to traffic firearms

Penalties: Up to 15 Years Imprisonment, Maximum \$250,000 Fine, or
both such fine and imprisonment, Maximum 3 Years Supervised
Release, and \$100 Mandatory Special Assessment

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.CAMRON FLAVEL Digitally signed by CAMRON FLAVEL
Date: 2025.05.29 08:27:59 -05'00'*Complainant's signature*

Camron C. Flavel, Special Agent

Printed name and title

- ☐ Sworn to before me and signed in my presence.
☒ Sworn to telephonically and signed electronically.

Date: May 29, 2025City and state: San Antonio, Texas*Judge's signature*

Hon. Henry J. Bemporad, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Camron Flavel, being duly sworn do hereby depose and state:

1. Your affiant has been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since September 2021 and is currently assigned to the San Antonio III Field Office. Prior to September 2021, I was employed as a United States Border Patrol Agent. I have a combined total of approximately six years of law enforcement experience and training with experience in investigations concerning violations of Title 18, including unlawful trafficking of firearms.
2. On May 13, 2025, ATF San Antonio III acting in an undercover capacity, posted five Scar rifles on an online platform.
3. On Friday May 16, 2025, Damian SOTO using the phone number ***-***-5726 contacted the ATF UC via text message inquiring about the firearms. The conversation between an ATF UC and SOTO continued between the dates of May 16, 2025, and May 28, 2025.
4. In the conversation, the ATF UC informed SOTO that the weapons were fully automatic machine guns and sent SOTO a video of the firearm being fired as a machine gun, operating in fully automatic – that is, firing more than one round with a single trigger pull.
5. The ATF UC and SOTO agreed to meet on May 28, 2025, to exchange three Scar rifle machine guns for approximately \$19,500.00
6. On May 28, 2025, SOTO arrived at a pre-determined location agreed to by both SOTO and the ATF UC. This location is in San Antonio, Texas, in the Western District of Texas. During this transaction, SOTO was again informed that the weapons he was purchasing were machine guns.
7. As the transaction was concluding, the ATF UCs gave a pre-planned takedown signal, at which point ATF Special Agents approached in government issued vehicles with police emergency equipment and wearing ATF marked vests. ATF Special Agents took SOTO into custody without incident and transported him to the ATF San Antonio Field Office.
8. SOTO travelled to San Antonio with the purpose and intent to purchase (3) machine guns. Furthermore, SOTO had reason to believe that the firearms were illegal to possess because the UC informed him of their illegal nature. Despite this, SOTO still agreed to purchase the firearms. Finally, SOTO has reason to believe that the transfer of those machine guns would constitute a felony as outlined in Title 18 Section 922(o) (Knowing possession of a machinegun).

9. Based on the above, your affiant believes probable cause exists that SOTO attempted to traffic firearms in violation of Title 18 United States Code Sections 933 (2) and (3).

Respectfully submitted,

CAMRON FLAVEL Digitally signed by CAMRON
FLAVEL
Date: 2025.05.29 09:50:16 -05'00'

Special Agent Camron Flavel
Bureau of Alcohol, Tobacco, Firearms, and Explosives

Subscribed to electronically and sworn telephonically on this 29th day of May, 2025


HON. HENRY J. BEMPORAD
UNITED STATES MAGISTRATE JUDGE